

1 GILADI

2 Q. When you travel to Israel, how long do
3 you stay?

4 A. It varies.

5 Q. Is there an average amount of time that
6 you stay for?

7 A. Average in the five years, if I take
8 everything together and average them, would be
9 approximately three weeks.

10 Q. Where do you stay when you are in
11 Israel?

12 A. With my family.

13 Q. What is the family's name?

14 A. Giladi.

15 Q. Do they have first names?

16 A. Shimon, and you have Yaakov, and you
17 have Eli.

18 Q. S-H-I-M-O-N?

19 A. Uh-huh.

20 Q. What were the other ones?

21 A. Eli.

22 Q. E --

23 A. E-L-I. You have Yaakov.

24 Q. Y-A-A-K-O-V?

25 A. Whatever.

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2 Q. Is that correct?

3 A. Y-A-A-K-O-V --

4 MR. DINHOFER: I think your spelling
5 is more phonetically correct.

6 MR. BURFORD: I am looking for
7 accuracy.

8 MR. DINHOFER: Accurate would be
9 Hebrew. In English there are variances on the
10 spelling and your spelling was the most close.

11 Q. The last names, they are all Giladi?

12 A. I said Giladi.

13 Q. Where do they live?

14 A. Natanya.

15 Q. N-A-T?

16 A. N-A-T.

17 MR. DINHOFER: N-A-T-A-N-Y-A.

18 THE WITNESS: Whichever.

19 Q. Roughly speaking, where is Natanya
20 located in Israel?

21 A. The center of the country.

22 Q. Is that close to Jerusalem or Tel Aviv
23 or something else?

24 A. Close to Tel Aviv.

25 Q. ~~When you are in Israel, do you have any~~

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2 doctors that you see?

3 A. Dr. Russo. And I am talking about
4 when be specific?

5 Q. Over the last five years.

6 A. I said I mentioned it before.

7 Q. Dr. Russo?

8 A. Dr. Russo and the doctor from Tel Aviv,
9 orthopedic from Tel Aviv, and I also saw
10 Dr. Strauch's friend one time, who I saw when he
11 was here in United States on one of my visits with
12 Dr. Strauch, and he told me that I should come to
13 his office to be evaluated, and me in his office,
14 because he was not too happy with what occurred at
15 Dr. Strauch's office.

16 Q. Did you go for an evaluation by that
17 doctor?

18 A. Yes, I did.

19 Q. What is that doctor's name?

20 A. Doctor, I really do not recall.

21 Q. Do you maintain any records, with
22 respect to your medical care?

23 A. No.

24 Q. Any notes, calendars, or diaries of
25 medical care or visits?

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2 A. No.

3 Q. Any diaries of symptoms or activities,
4 that you are experiencing?

5 A. No.

6 MR. DINHOFER: Other than that which
7 was previously disclosed.

8 MR. BURFORD: Well, to be honest with
9 you, I am not limiting my question. I asked it
10 twice, I got definite answers.

11 A. (Continuing) you are talking about for
12 the last five years?

13 Q. I just asked do you maintain.

14 A. Be specific, we are talking for the
15 last 20 minutes about the last five years. If you
16 are talking about more than five years you have to
17 be specific and tell me, we are not talking about
18 the last five years, we are talking about from the
19 beginning you had medical problems until today. I
20 am with the assumption that we are talking about
21 the last five years.

22 Q. I will adopt your phraseology.

23 From the beginning of 1980, up until
24 the present, do you maintain any records of medical
25 care?

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2 A. Yes, I do. I had.

3 Q. When you say you had, what are you
4 referring to?

5 A. The record that you have in your file,
6 that's the only things I had with regard to my
7 medical care.

8 Q. You still maintain the originals of
9 those?

10 A. Everything was -- brought to the
11 deposition, I don't know where they are at the
12 moment.

13 Q. What about diaries, do you maintain any
14 diaries for the last 20 years of activities?

15 A. No.

16 Q. Or symptoms?

17 A. Except what is being presented, no.

18 Q. Well, I am not limiting my question,
19 sir, to what has or has not been presented, I am
20 asking you what you have.

21 A. I responded. Besides to what I been,
22 what is being presented to you, no.

23 Q. Tell me what has been presented to me.

24 A. Pages of papers which explain
25 everything, and we went through a full deposition

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2 for me to explain it to, translate all the pages
3 and that's what I have.

4 Q. Do you maintain any other records, up
5 until today?

6 A. Not that I recall.

7 Q. Is there a possibility that you
8 maintain records?

9 A. I cannot tell, swear to that.

10 Q. Do you have any medical bills at home?

11 A. No.

12 Q. Cancelled --

13 A. Not that I know of.

14 Q. Cancelled checks or receipts for
15 medical payment?

16 A. No, I pay by cash.

17 Q. Do you have any letters or
18 correspondence of any doctors?

19 A. Not that I recall.

20 Q. Or tape recordings of any discussions
21 with any doctors?

22 A. No.

23 Q. Or videotapes of any discussions or
24 interviews with any doctors?

25 A. If the doctor made it, could be I never

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2 did it.

3 Q. I am just asking what you have, sir.

4 A. No, I don't.

5 Q. Have you gone for any physical therapy
6 in the last five years?

7 A. In the last five years?

8 Q. Yes.

9 A. I really do not recall.

10 Q. Any occupational therapy for the last
11 five years?

12 A. I do not recall.

13 Q. Have you had any physical therapy this
14 year?

15 A. No.

16 Q. Have you had any occupational therapy
17 this year?

18 A. No.

19 Q. Have you ever had physical therapy?

20 A. Yes.

21 Q. When was the last time?

22 A. What I recall?

23 Q. The last time you recall

24 A. It was nine -- 1993 or '94

25 Q. Who provided that?

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2 A. [REDACTED]

3 Q. At Einstein Hospital?

4 A. Yes.

5 Q. Have you seen a neurologist by the name
6 of Dr. Ray (phonetic)? Does that name sound
7 familiar to you?

8 A. Dr. Ray? This can be, this can be
9 Workmen's Comp. physician. Not that I know.

10 Q. Have you had any X-ray studies in the
11 last five years?

12 A. Last five years --

13 Q. And by "X-ray," I am going to use, that
14 would include CT scans, MRIs, plain X-rays.

15 A. Five years, I do not recall.

16 Q. Have you ever been to Madison Avenue
17 Imaging?

18 A. Yes.

19 Q. When were you at Madison Avenue
20 Imaging?

21 A. I really do not recall if it's five
22 years or six years or three years, I really do not
23 recall. I know that Dr. Goldstein sent me to
24 them.

25 Q. And what did you go there to have done?

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2 A. Back -- X-ray.

3 Q. Did anybody give you the results of
4 that back X-ray?

5 A. Dr. Goldstein told me that they found
6 some herniated disk.

7 Q. Did you see Dr. Spinner in the last
8 five years?

9 A. No.

10 Q. When was the last time you saw
11 Dr. Spinner?

12 A. If I am not mistaken, it was February
13 of '94, but I cannot swear to that date, but I
14 know -- it's not -- not too long after my surgery.

15 Q. Did you see Dr. Hernes?

16 A. That's the doctor in Tel Aviv
17 orthopedics.

18 Q. How do you spell Dr. Hernes' name?

19 A. I can spell in Hebrew, not English.

20 MR. DINHOFFER: H-E-R-N-E-S,
21 phonetically.

22 Q. Who referred you to Dr. Hernes?

23 A. Who referred me to Dr. Hernes?

24 Q. Yes.

25 A. I really do not recall.

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2 Q. When was the first time you saw
3 Dr. Hernes?

4 A. I believe in November or December of
5 1993.

6 Q. What brought you to Dr. Hernes?

7 A. My back.

8 Q. On how many occasions, since your first
9 visit, have you seen Dr. Hernes?

10 A. I saw him, I think until April. On and
11 off. Whenever I was in Israel.

12 Q. April of what year?

13 A. '94 -- I cannot tell you exactly. You
14 can look at his report, one of the dates, it was
15 in-- at the end on his reports.

16 Q. Do you have any reports from
17 Dr. Hernes?

18 A. If I have it? I had it and -- I
19 think-- I think it was submitted to you.

20 Q. You mentioned that you saw Dr. Hernes
21 until April. April of what year?

22 A. I think April before my hand surgery.
23 In '94.

24 Q. Until April of '94?

25 A. Yes.